



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ELM
F. #2015F01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 24, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
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Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government's filter team hereby furnishes discovery with respect to the above-captioned matter. This disclosure supplements the filter team's earlier disclosures under cover of letters dated May 24, 2017, July 12, 2017, August 8, 2017, October 23, 2017 and October 26, 2017.

Enclosed are copies of additional emails sent to or received by the email account associated with the address "zhongdan515@msn.com" (the "Zhong Email Account"), beyond those previously produced, which bear Bates numbers DZFILTER00014377-DZFILTER00015506. Please note that these materials may contain privileged attorney-client communications. The prosecution team has not reviewed these materials.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Elizabeth L. Macchiaverna
Elizabeth L. Macchiaverna
Assistant U.S. Attorney
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cc: Clerk of the Court (DLI) (by ECF)